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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

NEAL A. HAUSAM,

Plaintiff,

v.

MECOMINGS FINANCIAL, LLC;  
GMAC MORTGAGE, LLC; MORTGAGE  
ELECTRONIC REGISTRATION  
SYSTEMS, INC.; LSI TITLE OF OREGON,  
LLC; and EXECUTIVE TRUSTEE  
SERVICES, LLC,

Defendants.

Case No.:

MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE WHY PRELIMINARY  
INJUNCTION SHOULD NOT ENTER

COMES NOW Plaintiff Neal A. Hausam, by and through his attorneys Paul R.J. Connolly and Kevin J. Jacoby, and move the court for a temporary restraining order and order to show cause why a preliminary injunction should not enter. The purpose of the temporary restraining order is to enjoin the Defendants from proceeding with a foreclosure sale of the Plaintiff's sole residence, which is currently scheduled to occur on Monday, December 7, 2009. Because of the limited resources available to Plaintiff and the status

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SHOW CAUSE WHY PRELIMINARY INJUNCTION SHOULD NOT ENTER

of the parties, Plaintiff requests a nominal bond of \$1.

This motion is supported by FRCP 65, the pleadings on file, the Declaration of Neal A. Hausam, and the memorandum filed herewith.

The undersigned certifies that on December 3, 2009, the undersigned notified the Defendants of Plaintiff's intention to seek temporary injunctive relief. This certification is supported by the Declaration of Paul R.J. Connolly, filed herewith.

WHEREFORE, based upon the facts set forth in the Declarations of Neal Hausam and Paul R.J. Connolly, and arguments set forth in the memorandum, Plaintiff prays for a temporary restraining order restraining Defendants from proceeding with the sale of Plaintiffs' real property until further order of this court, and an order to show cause why a preliminary injunction should not be entered.

DATED this 3<sup>rd</sup> day of December, 2009.

By /s/ Paul Connolly

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